

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

NEW MEXICO TOP ORGANICS—ULTRA	)	
HEALTH, INC., and JACOB R.	)	
CANDELARIA, MATIAS TRUJILLO, as	)	
father and guardian of MT, a minor, ERICA	)	
ROWLAND, and ARIEL McDOUGAL, on	)	
behalf of themselves and all others similarly	)	
situated,	)	
	)	
Plaintiffs,	)	Civil Action No.: 1:22-cv-00546-KG-LF
	)	
v.	)	(Removed from the Second Judicial District
	)	Court, State of New Mexico, County of
BLUE CROSS AND BLUE SHIELD OF NEW	)	Bernalillo, Case No. D-202-CV-202203237)
MEXICO, PRESBYTERIAN HEALTH PLAN,	)	
INC., and WESTERN SKY COMMUNITY	)	
CARE, INC.,	)	
	)	
Defendants.	)	

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE  
TO EXCEED PAGE LIMITATIONS**

Pursuant to D.N.M.LR-Civ. 7.5, Defendants Blue Cross and Blue Shield of New Mexico, Presbyterian Health Plan, Inc., and Western Sky Community Care, Inc. move this Court for leave to file a Response to Plaintiffs' Motion to Remand [Doc. 24] that exceeds the applicable page limitation and will consist of no more than 30 pages.

As grounds for this motion, Defendants state that they intend to file a consolidated response to the Motion to Remand. This consolidation will reduce duplication and present legal arguments common to all parties and issues in a single pleading. This consolidation, in turn, along with the number and complexity of issues involved, requires this extension in the number of pages for Defendants' response to the Motion to Remand.

Pursuant to D.N.M.LR-Civ. 7, counsel for Plaintiffs does not oppose this motion.

WHEREFORE, Defendants request that this Court enter an order allowing Defendants to file a consolidated response to Plaintiffs' pending Motion to Remand to consist of no more than 30 pages.

Respectfully submitted,

/s/ Benjamin E. Thomas

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I HEREBY CERTIFY that on September 1, 2022, the foregoing pleading was electronically filed through the CM/ECF System, which caused all counsel of record to be served by electronic means.

SUTIN, THAYER & BROWNE  
A Professional Corporation

By /s/ Benjamin E. Thomas  
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